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*Attorneys for Defendants, The MDA, LLC,
Santa Fe Acoustics, LLC and Duaine Salazar*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

ROSEN MATERIALS OF NEVADA, LLC, a
Nevada Limited Liability Company,

Plaintiff,

vs.

THE MDA, LLC, a Utah Limited Liability
Company; SANTA FE ACOUSTICS, LLC,
an Arizona Limited Liability Company;
DUAINE SALAZAR, an individual; ROE
CORPORATIONS 1 through 20, inclusive;
and DOES 1 through 20, inclusive,

Defendants.

**MOTION FOR PERMISSION TO
ATTEND HEARING
TELEPHONICALLY**

Case No. 2:17-cv-01687-JAD-VCF

Judge Jennifer A. Dorsey

1 Defendants The MDA, LLC; Santa Fe Acoustics, LLC; and Duaine Salazar (the
2 Defendants), by and through counsel, hereby move for permission to attend upcoming hearing
3 telephonically.
4

5 1. Defendants removed this case to federal court on June 16, 2017.

6 2. By virtue of FED. R. CIV. P. 81(c)(2)(C), Defendants' deadline to respond to the
7 Complaint was 7 days after filing the notice of removal.

8 3. Although Defendants made a good faith request that Plaintiff stipulate to a 14-
9 day extension, Plaintiff has declined to stipulate to the requested extension.
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11 4. Defendants then moved this court for a 14-day extension pursuant to FED. R. CIV.
12 P. 7, LR 7-2, and LR IA 6-1.

13 5. On June 27, 2017, this court ordered that the Motion for Extension of Time to
14 Answer or Otherwise Respond to Complaint be heard at 10:00 AM, July 5, 2017.

15 6. Defendants' local Nevada co-counsel, Chet Glover, is unavailable to attend the
16 July 5, 2017 hearing.
17

18 7. Defendants' co-counsel, Michael Stanger, a Nevada licensed attorney, is located
19 in Utah.

20 8. Considering the anticipated short length of time necessary to argue this Motion,
21 the added complications of following a long holiday weekend, and the high costs associated with
22 travel to Nevada, Defendants respectfully request that Defendants' counsel, Michael Stanger, be
23 permitted to attend the July 5, 2017 hearing by telephone.
24

25 9. LR 1-1(b) specifically encourages parties to litigation to reduce costs by
26 appearing before magistrate judges via telephone.
27
28

1 WHEREFORE, for all the foregoing reasons, Defendants respectfully request that the
2 Court allow Defendants' counsel to attend the July 5, 2017 hearing telephonically.

3 DATED this 29th day of June, 2017.

4 STRONG & HANNI, PC

5
6 /s/ Michael D. Stanger

7 Michael D. Stanger
8 Co-counsel for Defendants, The MDA, LLC,
9 Santa Fe Acoustics, LLC and Duaine Salazar

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11
12 The call-in telephone number is (888)273-3658, access code: 3912597. The call
13 must be made five minutes prior to the hearing time. The court will join the call and
14 convene the proceedings. The call must be made on a land line. The use of a cell
15 phone or speaker phone during the proceedings is prohibited.

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21 IT IS SO ORDERED.

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23 UNITED STATES MAGISTRATE JUDGE

24 DATED: 6-29-2017

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of June, 2017, a true and correct copy of the
Foregoing **MOTION FOR PERMISSION TO ATTEND HEARING TELEPHONICALLY**
was served by the method indicated
below to the following:

Chet A. Glover, Esq.	()	U.S. Mail, Postage Prepaid
SMITH LARSEN & WIXOM	()	Hand Delivered
1935 Village Center Circle	(X)	Electronic E-File
Las Vegas, NV 89134	()	Facsimile

Becky A. Pintar, Esq.	()	U.S. Mail, Postage Prepaid
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/s/ Adriana Garcia
